

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

**R.A. JR. (a minor child, by and through his
Father and next friend, Richard Lemmel
Arnold,**

Plaintiff,

vs.

Case No.: CV-3:06-cv-337-WHA

**DEPUTY SHERIFF WALTER LACEY,
in his official and individual capacity,**

Defendant.

DEFENDANT'S REQUESTED SPECIAL INTERROGATORIES TO THE JURY

1. Did you find from a preponderance of the evidence that Deputy Walter Lacey could have reasonably believed that the actions taken by him were justified under the circumstances?

Answer Yes or No _____

2. Did you find from a preponderance of the evidence that Deputy Walter Lacey acted in defense of others?

Answer Yes or No _____

3. Did you find from a preponderance of the evidence that Deputy Walter Lacey was faced with a serious situation?

Answer Yes or No _____

4. Did you find from a preponderance of the evidence that the Plaintiff R.A., Jr. posed a threat to the safety of Q.J., Deputy Whitlow, or others?

Answer Yes or No _____

5. Did you find from a preponderance of the evidence that Deputy Walter Lacey was faced with a tense, uncertain and rapidly evolving situation?

Answer Yes or No _____

6. Did you find from a preponderance of the evidence that a reasonable person in Deputy Walter Lacey's circumstances would have perceived the defense of others as necessary?

Answer Yes or No _____

7. Did you find by a preponderance of the evidence that a reasonable officer possessing the same knowledge as Deputy Walter Lacey at the time could have believed that R.A., Jr. was either assaulting Q.J. or Deputy Whitlow?

Answer Yes or No _____

SO SAY WE ALL

DATED: _____

FOREPERSON